

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

# Air Permit Review

**Permit Issue Date:**

**Region:** Fayetteville Regional Office  
**County:** Cumberland  
**NC Facility ID:** 2600050  
**Inspector's Name:** Gregory Reeves  
**Date of Last Inspection:** 03/12/2015  
**Compliance Code:** 3 / Compliance - inspection

<p align="center"><b>Facility Data</b></p> <p><b>Applicant (Facility's Name):</b> The Goodyear Tire &amp; Rubber Company</p> <p><b>Facility Address:</b>  The Goodyear Tire &amp; Rubber Company  6650 Ramsey Street  Fayetteville, NC 28311</p> <p><b>SIC:</b> 3011 / Tires And Inner Tubes  <b>NAICS:</b> 326211 / Tire Manufacturing (except Retreading)</p> <p><b>Facility Classification: Before:</b> Title V <b>After:</b> Title V  <b>Fee Classification: Before:</b> Title V <b>After:</b> Title V</p>				<p align="center"><b>Permit Applicability (this application only)</b></p> <p><b>SIP:</b> 15A NCAC 02Q.0517  <b>NSPS:</b> N/A  <b>NESHAP:</b> N/A  <b>PSD:</b> N/A  <b>PSD Avoidance:</b> N/A  <b>NC Toxics:</b> N/A  <b>112(r):</b> N/A  <b>Other:</b> N/A</p>																																																			
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<p><b>Review Engineer:</b> Gautam Patnaik</p> <p><b>Review Engineer's Signature:</b>                      <b>Date:</b></p>				<p align="center"><b>Comments / Recommendations:</b></p> <p><b>Issue:</b> 00011/T49  <b>Permit Issue Date:</b>  <b>Permit Expiration Date:</b></p>																																																			

## I. Facility Description

The Goodyear Tire & Rubber Company operates a rubber tire manufacturing plant in Fayetteville, Cumberland County, North Carolina. The facility primarily produces passenger tires and radial light truck tires.

## II. Purpose of Applications

The four natural gas/No. 6 fuel oil/No. 2 fuel oil/recycled No. 6 fuel oil-fired boilers (ID Nos. BL01 through BL04) are currently subject to the 15A NCAC 02D .1109: Case-by-Case MACT. During the renewal application (Application # 2600050.13A) for this facility the MACT Subpart DDDDD . “National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters” was incorporated into the permit (Section 2.1.A. 6., of the current permit).

However, the renewal did not address the sunset dates (end date) to the 02D .1109 regulations. To rectify this situation this application was created as a “reopen for cause” modification. This action cannot be done under an administrative amendment. This reopen for cause will require a 30 day public notice and 45 days EPA review.

## III. Regulatory Summary

- 15A NCAC 2D .1109: CAA § 112(j); Case-by-Case MACT for Boilers & Process Heaters

As mentioned above, the last effective date for 15A NCAC 02D .1109: Case-by-Case MACT (May 19, 2019) was added in Section 2.1.A. 5. h., of the modified permit. Also the effective date (May 20, 2019) for MACT Subpart DDDDD was added in Section 2.1.A. 6. i., of the modified permit.

- 15A NCAC 02D .0524: New Source Performance Standards Subpart BBB, “Standards of Performance for the Rubber Tire Manufacturing Industry”

(See applicant’s comments in Section IV., of this review below)

The applicant wanted to include all compliance options available for the green tire spraying operations under 40 CFR 60, NSPS Subpart BBB, for maximum flexibility.

Currently the facility complying with 40 CFR § 60.543(b)(4) for each tread end cementing operation and each green tire spraying operation using only water-based sprays containing less than 1.0 percent, by weight, of VOC, the facility submits formulation data or the results of Method 24 analysis annually to verify the VOC content in lieu of conducting monthly performance test.

The option added was for each tread end cementing operation and each green tire spraying operation where water-based cements or sprays **containing 1.0 percent, by weight, of VOC or more** are used that **does not** use a VOC emission reduction system, the facility shall as per 40 CFR § 60.543(d):

- 1) Determine the density and weight fraction of VOC;  
[ 40 CFR § 60.543 (c)(1)]
- 2) Calculate the total mass of VOC used at the affected facility for the month ( $M_o$ );  
[40 CFR § 60.543 (c)(2)]
- 3) Determine the total number of tires cemented or sprayed for the month by the following procedure:
  - i) for a trend end cementing operation, ( $T_o$ ) equals the number of tread or combined tread/sidewall components that receive an application of tread end cement for the month.
  - ii) for a green tire spraying operation that uses water-based inside green tire sprays, ( $T_o$ ) equals the number of green tires that receive an application of water-based inside green tire spray for the month.
 [40 CFR § 60.543(d)(3)]
- 4) Calculate the mass of VOC used per tire cemented or sprayed at the affected facility for the month ( $G$ ): [40 CFR § 60.543(d)(4)]

$$G = \frac{M_o}{T_o}$$

- 5) Calculate the mass of VOC emitted per tire cemented or sprayed at the affected facility for the month ( $N$ ): [40 CFR § 60.543(d)(5)]

$$N = G$$

(See Section 2.1 D. 1. e. i., and ii., of the modified permit).

To comply with the above new compliance option (40 CFR § 60.543(d)) and 40 CFR § 60.546(c)(2) The facility shall report the results of all performance tests, required. The data for each of the performance tests shall include the mass of VOC used ( $M_o$ ), the number of tires cemented or sprayed ( $T_o$ ) and the mass of VOC emitted per tire cemented or sprayed ( $N$ ).

40 CFR § 60.546(c)(2) requires for each affected facility that seeks to comply with a VOC emission limit per tire or per bead specified under §60.542(a) without the use of a VOC emission reduction system: the mass of VOC used ( $M_o$ ), the number of tires cemented or sprayed ( $T_o$ ), the mass of VOC emitted per tire cemented or sprayed ( $N$ ), ***the number of beads cemented ( $B_o$ ), and the mass of VOC emitted per bead cemented ( $N_b$ ).***

for green tire spraying operations where only water-based sprays are used, the emission limit established in 40 CFR § 60.542(a)(5) is on a “per tire sprayed” basis, therefore ***the number of beads cemented ( $B_o$ ), and the mass of VOC emitted per bead cemented ( $N_b$ ) is not applicable to green tire spraying operations*** and thus, not required to be reported.

(See Section 2.1 D. 1. h., of the modified permit).

#### IV. Consistency Determination, Comments, and Recommendations

A zoning consistency determination was not required.

Regional Office, the applicant, and the SSCB (Stationary Source Compliance Branch), were provided a draft of this permit their comments were taken into account.

The Regional Office had no comments

The applicant in an e-mail on 3/28/2016 responded:

“Requests that Condition 2.1.D.1 be updated to include all compliance options available for the green tire spraying operations under 40 CFR 60, NSPS Subpart BBB.”

## V. Table of Changes

<b>Page Number</b>	<b>Condition Number</b>	<b>Change</b>
3 to 14	NA	Corrected referenced page numbers in emission source table
18	2.1.A. 5. h.	Added Sunset date for 02D .1109: Case-by-Case MACT
19	2.1.A. 6. a. i.	Added effective date for MACT Subpart DDDDD
45 to 54	“General Conditions“	Added latest version of the General Conditions.